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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

**IN RE: UBER TECHNOLOGIES, INC.,
PASSENGER SEXUAL ASSAULT
LITIGATION**

This Document Relates to:

ALL ACTIONS

Case No. 3:23-md-03084-CRB

**DEFENDANTS UBER TECHNOLOGIES,
INC., RASIER LLC AND RASIER-CA,
LLC'S UNOPPOSED ADMINISTRATIVE
MOTION TO SEAL PORTIONS OF THE
MAY 22, 2025 HEARING TRANSCRIPT**

Judge: Hon. Lisa J. Cisneros
Courtroom: G - 15th Floor

Pursuant to Northern District of California Civil Local Rules 7-11 and 79-5(f)(3), Defendants Uber Technologies Inc., Rasier LLC and Rasier-CA, LLC (collectively, “Uber”) respectfully submit this Unopposed Administrative Motion (“Motion”) to Seal Portions of the May 22, 2025 Hearing Transcript (“Hearing Transcript”), attached hereto as Exhibit A. Uber’s request is narrowly tailored and seeks to seal only two lines of a 73-page transcript. The narrow redactions Uber seeks pertain to the past physical whereabouts of a current Uber executive, the disclosure of which implicates security and safety concerns. Uber has conferred with Plaintiffs, who do not oppose the Motion. *See* Declaration of Laura Vartain Horn in Support of the Unopposed Administrative Motion to Seal (“Vartain Horn Decl.”), ¶ 6. For the reasons set forth herein, good cause exists to seal the following portions of the Hearing Transcript:

Document	Text to be Sealed	Party Claiming Confidentiality
May 22, 2025 Hearing Transcript	Portions highlighted at pages: 14:22-14:23	Uber Technologies Inc.; Rasier LLC; Rasier-CA, LLC

I. LEGAL STANDARD

While courts have historically recognized a “general right to inspect and copy public records and documents, including judicial records and documents,” courts will seal filings – including hearing transcripts – where the moving party demonstrates compelling reasons or good cause to do so. *Doe I v. Wolf*, No. 18-cv-02349-BLF, 2020 WL 8746023, at *1 (N.D. Cal. Sept. 22, 2020) (Freeman, J.) (citations omitted). Local Rule 79-5(c) contemplates that motions to seal should be “narrowly tailored to seal only the sealable material.” *Id.*

In the case of filings that are “more than tangentially related to the merits of a case,” sealing requires a showing of “compelling reasons.” *Id.* (citations omitted). For filings “only tangentially related to the merits,” a party need only make the lesser showing that there is “good cause” for sealing. *Id.* Under the “good cause” standard, a court may seal documents “to protect a party or person from annoyance, embarrassment, oppression, or undue burden or expense.” *Diablo Techs., Inc. v. Netlist, Inc.*, No. 13-cv-3901-YGR, 2014 WL 31467, at *3 (N.D. Cal. Jan. 3, 2014) (Rogers, J.) (finding good cause to grant motion to seal where unredacted anonymous letter containing private information about

1 the defendant met the “relatively low threshold” for sealing) (citations omitted); *see also, e.g., McGee*
 2 *v. Milpitas Police Dep’t*, No. 23-cv-02559-VKD, ECF No. 43 at 5, n.2 (N.D. Cal. Oct. 23, 2023)
 3 (Demarchi, J.) (granting motion to seal various court opinions filed as exhibits where opinions
 4 revealed information about the plaintiff’s juvenile adjudication and law enforcement database records,
 5 among other things), attached hereto as Exhibit B. Because the Hearing Transcript pertains to
 6 scheduling and discovery matters that are only “tangentially related” to the merits of the case, the
 7 “good cause” standard applies to this Motion.

8 **II. ARGUMENT**

9 Good cause exists for sealing two discrete lines of the Hearing Transcript. Recognizing the
 10 presumption favoring open access to court proceedings, Uber requests that these lines remain under
 11 seal because they disclose the past physical whereabouts of a current Uber executive, implicating
 12 privacy and safety concerns for Ms. Jill Hazelbaker. Specifically, Ms. Hazelbaker is a current Uber
 13 executive whose physical whereabouts and political activities are unrelated to the merits of this
 14 litigation. The disclosure of this information therefore serves no legitimate public interest and
 15 threatens to subject Ms. Hazelbaker to the undue burden of needless public scrutiny that is wholly
 16 unrelated to Ms. Hazelbaker’s tenure at Uber or any of Plaintiffs’ allegations in this proceeding.

17 Accordingly, good cause exists for the Court to seal the narrow portions of the Hearing
 18 Transcript outlined above. Since hearing transcripts are published to the Court’s docket in the normal
 19 course, there is no less restrictive alternative to sealing in this instance. Uber therefore respectfully
 20 requests that the Court order that the portions of the Hearing Transcript containing the redactions in
 21 Exhibit A, be published and maintained on the docket under seal.

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1 Dated: June 12, 2025

Respectfully submitted,

2 By: /s/ Laura Vartain Horn
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